

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

BRANDON CALLIER,

Plaintiff,

v.

**TAX DEFENDER LLC,
TAX DEFENDER USA LLC, and
THOMAS CAHILL**

Defendants.

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Case No. EP-22-CV-0181

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

Defendants TAX DEFENDER, LLC, TAX DEFENDER USA LLC and THOMAS CAHILL respectfully file this Unopposed Motion for Extension of Time to Respond to Plaintiff BRANDON CALLIER’s (“Plaintiff”) First Amended Complaint as follows:

1. Defendant Tax Defender LLC’s, Defendant Tax Defender USA LLC’s, and Thomas Cahill’s deadline to respond to Plaintiff’s First Amended Complaint is August 17, 2022. Defendants and their counsel require additional time to gather information to adequately respond to the allegations in Plaintiff’s First Amended Complaint. Defendants, therefore, request an additional 14 days, to August 31, 2022, to file their answers or responsive pleadings to Plaintiff’s First Amended Complaint.

2. This extension is not sought for purposes of delay, but rather so Defendants may adequately confer with counsel to vet and address the factual allegations set forth in Plaintiff’s First Amended Complaint and may prepare an appropriate answer or response.

3. Pursuant to Local Court Rule CV-7(G), Defendants’ counsel conferred with Plaintiff regarding this motion and request for an extension of 14 days to answer or respond to

Plaintiff's First Amended Complaint. Plaintiff agrees to this motion and is unopposed to the requested relief.

4. With the agreement of Plaintiff, therefore, Defendants request the Court to extend Defendants' deadline to file an answer or responsive pleading to August 31, 2022.

WHEREFORE, premises considered, Defendants request the Court to grant this Unopposed Motion for Extension of Time to Respond to Plaintiff's First Amended Complaint and to extend the deadline by which Defendants must file an answer or responsive pleading to August 31, 2022.

Respectfully submitted,

KEMP SMITH LLP
P.O. Box 2800
El Paso, Texas 79999-2800
915.533.4424
915.546.5360 (FAX)

By: /s/ Shelly W. Rivas
Mark N. Osborn
State Bar No. 15326700
mosborn@kempsmith.com
Shelly W. Rivas
State Bar No. 24003145
srivas@kempsmith.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served on all parties and counsel of record via the Court's CM/ECF system and/or via regular mail in accordance with the Federal Rules of Civil Procedure on August 17, 2022.

/s/ Shelly W. Rivas
Shelly W. Rivas